

Mr. Philip Conarro
Johns Manville International, Inc.
Post Office Box 428
Richmond, Indiana 47374

RE: 177-12976
Second Administrative Amendment to
Construction Permit 177-5873-00006

Dear Mr. Conarro:

Johns Manville, International, Inc., was issued a construction permit on April 22, 1999 for a wood fiberglass insulation manufacturing plant. A letter requesting that the permit be revised to reflect new State Implementation Plan (SIP) limits contained in 326 IAC 6-1-14 that came into effect in February 2000, was received on November 27, 2000. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

The changes that are described below are being made to reflect changes to the site-specific SIP limits for Johns Manville in 326 IAC 6-1-14. In 1996, when Johns Manville applied for a construction permit, it became necessary to submit new SIP limits for EPA approval, as well as conducting a PSD review. The PSD review was based on the higher SIP limits they were seeking. However, when the construction permit was issued in April 1999, the new SIP limits had not been approved by EPA. As a result, the old SIP limits were put in the construction permit with the understanding that these limits would be modified as soon as the new SIP limits were approved. The new SIP limits were approved and became effective in February of 2000. The changes below incorporate these new SIP limits.

- (a) The PM emission limitations in Condition D.3.1 (b) will be changed to reflect the new SIP limits as follows:
- (b) Pursuant to 326 IAC 6-1-14 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from each manufacturing line shall comply with the following limitations:

Facility	Pollutant Limitations	
	tons/yr	gr/dscf
Line 2 Forming Process	31.2 58.3	0.02
Line 2 Curing Process	0	--
Line 3 Forming Process	58.5 123.6	0.02
Line 3 Curing Process	49.5 27.4	0.02
Line 6 Forming Process	45.6 45.4	0.02
Line 6 Curing Process	4.0 6.2	0.02

- (b) The production rate limits in Condition D.3.2(d) will also be changed to reflect the new SIP limits. In the construction permit, this limit was given in terms of unbonded glass production (tons/year). The new limits will be given in terms of total glass production (tons/year), including both bonded and unbonded production. This new limit format will make it easier to understand and track. In addition, to clarify the basis for each of the operation standards in Condition D.3.2, the first phrase of the condition "Pursuant to 326 IAC 2-2-3(a)(3)," will be moved to the beginning of paragraphs (a), (b), and (c). The operational standards in paragraphs (d) and (e) are based on 326 IAC 6-1-14 and Condition D.3.1(b). Changes to Section D.3.2 are as follows:

D.3.2 Operation Standards

~~Pursuant to 326 IAC 2-2-3(a)(3),~~ The forming, curing, and cooling processes shall comply with the following limitations:

- (a) ~~Pursuant to 326 IAC 2-2-3(a)(3),~~ Line 2 Forming Process shall not exceed a glass production rate of unbonded product of 7,200 pounds per hour;
- (b) ~~Pursuant to 326 IAC 2-2-3(a)(3),~~ Line 3 Forming, Curing, and Cooling Process shall not exceed a combined glass production rate of bonded and unbonded product of 7,200 pounds per hour; and
- (c) ~~Pursuant to 326 IAC 2-2-3(a)(3),~~ Line 6 Forming and Curing Process shall not exceed a combined glass production rate of bonded and unbonded product of 4,000 pounds per hour.
- (d) The **total** production of **bonded and** unbonded product from each line shall be limited as follows to demonstrate compliance with the annual PM emission limitations required by Operation Condition D.3.1(b):

Facility	Unbonded Total Glass Production Limitation, tons/yr
Line 2 Forming Process	46,865 31,536
Line 3 Forming Process	31,622⁺ 31,536
Line 6 Forming Process	8,432² 17,520

⁺ ~~For every ton of bonded product produced from Line 3, the above limitations shall be reduced by 2.67 tons.~~

² ~~For every ton of bonded product produced from Line 6, the above limitations shall be reduced by 2.17 tons.~~

- (e) The production of bonded product from Line 6 shall be limited to 6,240 tons per year, rolled on a monthly basis, to demonstrate compliance with the PM and VOC emission limitations required by Operation Condition D.3.1(b).
- (c) A new condition, Condition D.3.9, will be added requiring the Permittee to report in order to demonstrate compliance with Conditions D.3.2(d) and (e). The construction permit did contain an appropriate reporting form but there was not a specific reporting condition. Therefore, this change does not add a reporting requirement, but clarifies the existing requirement. The new condition is as follows:

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C -General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) The reporting form referred to in (c) must be changed to reflect the new SIP limits. This form will also be changed to reflect the fact that the new production limit is in terms of total production instead of unbonded production as discussed in (b) above. The form will be changed as follows:

Indiana Department of Environmental Management Office of Air Quality Compliance Data Section

Quarterly Report

Source Name: Johns Manville International, Inc.
Source Address: 814 Richmond Avenue, Richmond, Indiana 47374
Mailing Address: 814 Richmond Avenue, Richmond, Indiana 47374
Source Modification No.: CP 177-5873-00006
Source/Facility: Lines 2, 3, and 6 Production Processes
Limits: Production Limits Required by Operation Condition D.3.2(d) and (e)

Year: _____

Month	Production Facility	Production this Month, tons	Production Last 12 Months, tons	Production Limit, tons/12 consecutive months
	Line 2 Unbonded			16,865 31,536
	Line 3 Unbonded			31,622 31,536
	Line 3 Bonded ⁺			
	Line 6 Unbonded			8,432 17,520
	Line 6 Bonded ^{2,3 1}			
	Line 2 Unbonded			16,865 31,536
	Line 3 Unbonded			31,622 31,536
	Line 3 Bonded ⁺			
	Line 6 Unbonded			8,432 17,520
	Line 6 Bonded ^{2,3 1}			
	Line 2 Unbonded			16,865 31,536
	Line 3 Unbonded			31,622 31,536
	Line 3 Bonded ⁺			
	Line 6 Unbonded			8,432 17,520
	Line 6 Bonded ^{2,3 1}			

⁺ For every ton of bonded product produced from Line 3, the above limitations shall be reduced by 2.67 tons.

² For every ton of bonded product produced from Line 6, the above limitations shall be reduced by 2.17 tons.

³¹ The production of bonded product from Line 6 shall be limited to 6,240 tons per year, rolled on a monthly basis.

9 I certify that none of the hourly production limits established in Operation Conditions D.2.2, D.3.2, and D.4.2 of CP-177-5873 were exceeded this quarter.

Submitted by: _____
Title / Position: _____

Date: _____
Signature: _____

- (e) Johns Manville requested to change the particulate matter emission limit from 0.25 lbs per ton of glass pulled to 0.5 lbs per ton of glass pulled to be consistent with the requirements of the new MACT standard for the fiberglass industry. However, the limit that is currently in Johns Manville's permit, 0.25 lb PM per ton glass pulled is based on a PSD requirement and therefore, cannot be changed if Johns Manville is to maintain compliance with PSD requirements. Therefore, these changes were not made.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mae Thomas, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7836 to speak directly to Ms. Thomas. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/MT

cc: File - Wayne County
U.S. EPA, Region V
Wayne County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Jerry Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

CONSTRUCTION PERMIT OFFICE OF AIR QUALITY

**Johns Manville International, Inc.
814 Richmond Avenue
Richmond, Indiana 47374**

(herein known as the Permittee) is hereby authorized to construct the facilities listed in Section A (Source Summary) of this permit. This permit is issued in accordance with the provisions of 326 IAC 2-1, 326 IAC 2-2, 40 CFR 52.780 and 40 CFR 124, with conditions listed on the attached pages.

Construction Permit.: CP-177-5873-00006	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 22, 1999

First Administrative Amendment: 177-11122, issued July 6, 1999

Second Administrative Amendment		Pages Affected: 21, 22, 23, 27, 27a, 41
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:	

Emission Limitations and Standards:

D.3.1 Pollutant Emission Limitations

- (a) Pursuant to 326 IAC 2-2-3(a)(3) (Prevention of Significant Deterioration (PSD) Rules), each manufacturing line shall comply with the following limitations:

(1) Unbonded Product Limitations

Facility	Pollutant Limitations		
	PM/PM ₁₀ (lb/ton glass pulled)	VOC (lbs/hr)	CO (lbs/hr)
Line 2 Forming Process	3.70	6.78	21.0
Line 3 Forming Process	3.70	6.78	21.0
Line 6 Forming Process	3.70	3.77	25.3

(2) Bonded Product Limitations

Facility	Pollutant Limitations		
	PM/PM ₁₀ (lb/ton glass pulled)	VOC (lbs/hr)	CO (lbs/hr)
Line 3 Forming Process	2.19	18.6	21.0
Line 3 Curing Process	0.56	4.25	1.22
Line 6 Cooling Process	0.29	0.4	0.39
Line 6 Forming Process	7.84	8.66	25.3
Line 6 Curing Process	1.99	1.50	1.22

PM/PM₁₀ means that the PM limit and the PM₁₀ limit are the same and shall be measured as the sum of the filterable and condensable fractions. The particulate matter emissions established above demonstrate compliance with 40 CFR 60, Subpart PPP (New Source Performance Standards (NSPS) for Wool Fiberglass Insulation Manufacturing Plants).

- (b) Pursuant to 326 IAC 6-1-14 (Nonattainment Area Particulate Limitations), the particulate matter (PM) emissions from each manufacturing line shall comply with the following limitations:

Facility	Pollutant Limitations	
	tons/yr	gr/dscf
Line 2 Forming Process	58.3	0.02
Line 2 Curing Process	0	--
Line 3 Forming Process	123.6	0.02
Line 3 Curing Process	27.4	0.02
Line 6 Forming Process	45.4	0.02
Line 6 Curing Process	6.2	0.02

- (c) The particulate matter emissions established in (a) and (b) above shall supersede the following Operation Permit Conditions:

Facility	Operation Permit Condition
Line 2 Forming/Curing Process	Condition 5 of Operation Permit No. 89-02-88-0166, issued on April 2, 1984
Line 3 Forming/Curing Process	Condition 5 of Operation Permit No. 89-02-88-0167, issued on April 2, 1984

- (d) In order to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), each manufacturing line shall comply with the following limitations:

Facility	Pollutant Emissions Limitations, lb/hr	
	NO _x	SO ₂
Line 2 Forming Process	2.03	0
Line 3 Forming Process	2.03	0
Line 3 Curing Process	1.51	0
Line 6 Cooling Process	0.46	0
Line 6 Forming Process	2.18	0
Line 6 Curing Process	0.84	0

- (e) In order to avoid the requirements of 326 IAC 2-1-3.4 (New Source Toxics Control Rule), the hazardous air pollutant (HAP) emissions from manufacturing lines 2, 3, and 6 shall be less than 10 tons of a single HAP per year and less than 25 tons of combined HAPs per year.

D.3.2 Operation Standards

The forming, curing, and cooling processes shall comply with the following limitations:

- (a) Pursuant to 326 IAC 2-2-3(a)(3), line 2 Forming Process shall not exceed a glass production rate of unbonded product of 7,200 pounds per hour;
- (b) Pursuant to 326 IAC 2-2-3(a)(3), line 3 Forming, Curing, and Cooling Process shall not exceed a combined glass production rate of bonded and unbonded product of 7,200 pounds per hour; and
- (c) Pursuant to 326 IAC 2-2-3(a)(3), line 6 Forming and Curing Process shall not exceed a combined glass production rate of bonded and unbonded product of 4,000 pounds per hour.
- (d) The production of unbonded product from each line shall be limited as follows to demonstrate compliance with the annual PM emission limitations required by Operation Condition D.3.1(b):

Facility	Total Glass Production Limitation, tons/yr
Line 2 Forming Process	31,536
Line 3 Forming Process	31,536
Line 6 Forming Process	17,520

- (e) The production of bonded product from Line 6 shall be limited to 6,240 tons per year, rolled on a monthly basis, to demonstrate compliance with the PM and VOC emission limitations required by Operation Condition D.3.1(b).

D.3.3 BACT Requirement

Pursuant to 326 IAC 2-2-3(a)(3) (Prevention of Significant Deterioration (PSD) Rules), the Line 2 curing oven shall be permanently removed from service upon construction and operation of this permit modification.

Compliance Determination and Monitoring

D.3.4 Performance Testing

- (a) Pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements), the following compliance stack tests shall be performed within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Lines 3 and 6 shall be performed for both bonded and unbonded products:

Stack	Process	PM/PM ₁₀ ¹	NO _x ²	VOC	CO	HAP ³
S2	Line 2 Forming Unbonded	3.70 lb/ton 0.02 gr/dscf	2.03 lbs/hr	6.78 lb/hr	21.0 lb/hr	
S2	Line 6 Forming, Curing - Bonded	3.70 lb/ton 0.02 gr/dscf	2.03 lbs/hr	3.77 lb/hr	25.3 lb/hr	
S2	Line 6 Forming/Curing - Bonded	9.83 lb/ton 0.02 gr/dscf	3.02 lbs/hr	10.2 lb/hr	26.5 lb/hr	2.28 lb/hr Single HAP; 5.71 lb/hr Combined HAP
S3	Line 3 Forming - Unbonded	3.70 lb/ton 0.02 gr/dscf	2.03 lbs/hr	6.78 lb/hr	21.0 lb/hr	
S3	Line 3 Forming/Curing/Cooling - Bonded	3.04 lb/ton 0.02 gr/dscf	4.0 lbs/hr	23.6 lb/hr	22.9 lb/hr	2.28 lb/hr Single HAP; 5.71 lb/hr Combined HAP

¹ PM/PM₁₀ means that the PM limit and the PM₁₀ limit are the same. PM shall be measured in accordance with 40 CFR 60, Appendix A, Method 5. PM₁₀ shall be measured in accordance with 40 CFR 51, Appendix M, Methods 201A and 202.

- (2) daily logs of the parameters established in Operation Condition D.3.6(a), semi-annual logs of the parameters established in Operation Condition D.3.6(b) and quarterly logs of the parameters established in Operation Condition D.3.6(d) shall be performed to demonstrate compliance with the PM emission limitations for lines 3 and 6 curing ovens and cooling processes required by Operation Condition D.3.1.
 - (3) daily logs of the parameters established in Operation Condition D.3.8(a) semi-annual logs of the parameters established in Operation Condition D.3.8(b) and quarterly logs of the parameters established in Operation Condition D.3.8(d) shall be performed to demonstrate compliance with the PM emission limitation for the production of bonded product on manufacturing line 3 required by Operation Condition D.3.1.
- (b) Records shall be retained for a minimum period of five (5) years. Records of the previous three (3) years shall be kept at the source location and be made available within one (1) hour upon verbal request of an IDEM, OAQ, representative. Records of the remaining two (2) years may be stored elsewhere provided they be made available to the OAQ within thirty (30) days after written request.
- (c) Records of required monitoring information shall include, where applicable:
 - (1) the date, place, and time of sampling or measurements;
 - (2) the dates analyses were performed;
 - (3) the company or entity performing the analyses;
 - (4) the analytic techniques or methods used;
 - (5) the results of such analyses; and
 - (6) the operating conditions existing at the time of sampling or measurement.
- (d) Support information shall include, where applicable:
 - (1) copies of all reports required by this permit;
 - (2) all original strip chart recordings for continuous monitoring instrumentation;
 - (3) all calibration and maintenance records; and
 - (4) records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (e) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C -General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section**

Quarterly Report

Source Name: Johns Manville International, Inc.
Source Address: 814 Richmond Avenue, Richmond, Indiana 47374
Mailing Address: 814 Richmond Avenue, Richmond, Indiana 47374
Source Modification No.: CP 177-5873-00006
Source/Facility: Lines 2, 3, and 6 Production Processes
Limits: Production Limits Required by Operation Condition D.3.2(d) and (e)

Year: _____

Month	Production Facility	Production this Month, tons	Production Last 12 Months, tons	Production Limit, tons/12 consecutive months
	Line 2 Unbonded			31,536
	Line 3 Unbonded			31,536
	Line 3 Bonded			
	Line 6 Unbonded			17,520
	Line 6 Bonded ¹			
	Line 2 Unbonded			31,536
	Line 3 Unbonded			31,536
	Line 3 Bonded			
	Line 6 Unbonded			17,520
	Line 6 Bonded ¹			
	Line 2 Unbonded			31,536
	Line 3 Unbonded			31536
	Line 3 Bonded			
	Line 6 Unbonded			17,520
	Line 6 Bonded ¹			

¹ The production of bonded product from Line 6 shall be limited to 6,240 tons per year, rolled on a monthly basis.

9 I certify that none of the hourly production limits established in Operation Conditions D.2.2, D.3.2, and D.4.2 of CP-177-5873 were exceeded this quarter.

Submitted by: _____

Date: _____

Title / Position: _____

Signature: _____